

Service Date: October 15, 2012

DEPARTMENT OF PUBLIC SERVICE REGULATION
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MONTANA

IN THE MATTER of the Petition of Montana-)	REGULATORY DIVISION
Dakota Utilities Co. for Certification of Eligible)	
Renewable Resources and Community Renewable)	DOCKET NO. D2012.3.24
Energy Resources)	

**MONTANA PUBLIC SERVICE COMMISSION DATA REQUESTS PSC-005
THROUGH PSC-024
TO
MONTANA-DAKOTA UTILITIES COMPANY**

PSC-005

Regarding: Diamond Willow Phasing Rationale
Witness: Neigum

On page 6 of your testimony you state, “The site was in an advanced development stage with enough land leases and available transmission capacity to support a 30 MW project,” and “Montana Dakota deemed it prudent and cost effective to obtain MISO approval of a 30 MW interconnection at that location.” Please provide documentation from before or during the time frame in which this decision was made which describes the rationale as to why Diamond Willow was constructed in two phases, as opposed to just a single phase.

PSC-006

Regarding: Public Documentation on Diamond Willow
Witness: Neigum

- a. Please provide documentation, including correspondence, testimony before the Montana PSC or elsewhere, press releases, media statements, and any other source, that refers to the planned or expected capacity of Diamond Willow.
- b. Please provide documentation, including correspondence, testimony before the Montana PSC or elsewhere, press releases, and media statements that refers to Diamond Willow being built in phases.

PSC-007

Regarding: IRPs on Diamond Willow
Witness: Neigum

Please provide copies of any pages from Montana-Dakota's Integrated Resource Plans that refer to Diamond Willow.

PSC-008

Regarding: Diamond Willow Key Points Timeline
Witness: Neigum

Please provide a timeline for Diamond Willow which includes key decision points, significant events in planning, construction and operation, and any changes in Montana laws which influenced Montana-Dakota's decision-making.

PSC-009

Regarding: Diamond Willow 1 and 2 Commonality
Witness: Neigum

Please describe and provide detailed documentation which augments information previously supplied in response to discovery questions on the extent to which Diamond Willow 1 and Diamond Willow 2 have common or separate elements such as control houses, roads, and perimeter fences. Provide a legible layout or map of the Diamond Willow facility, including a scale of distance.

PSC-010

Regarding: Diamond Willow Construction Overlap
Witness: Neigum

Please describe and provide detailed documentation on the extent to which there was work completed during the construction of Diamond Willow 1 which was necessary for the construction of Diamond Willow 2, such as pouring concrete pads, establishing roads, erecting fences, completing permit requests, filing required reports, amending land leases or agreements, or obtaining bids.

PSC-011

Regarding: Diamond Willow Electrical Details
Witness: Neigum

Please provide legible documentation showing the details of the electrical connections within Diamond Willow and the tie to the power grid, including items

such as generators, transformers, fuses, disconnects, switches, breakers, cross ties, taps, meters, and instrumentation.

PSC-012

Regarding: Title 69 Legislation in 2009

Witness: Neigum

Please provide copies of all correspondence in Montana-Dakota's or its representatives' possession, including emails, regarding bills considered by the Montana Legislature in 2009 relating to community renewable energy projects.

PSC-013

Regarding: Legislative History

Witness: Neigum

- a. Provide documentation from the legislative history to support the assertion made in Montana-Dakota's July 19, 2012 filing, Consolidated Motions for Reconsideration and Rehearing, on page 8, which states, "The legislative history behind the 2009 amendments to the Act make it abundantly clear that the Montana Legislature intended that utility-owned and locally-owned community renewable energy projects (CREPs) be treated on the same footing."
- b. Provide documentation from the legislative history to support Montana-Dakota's assertion that "total calculated nameplate capacity" and "total nameplate capacity" are terms with an identical meaning.

PSC-014

Regarding: Montana-Dakota's CREP Obligations

Witness: Neigum

On Page 10 of its Consolidated Motions for Reconsideration and Rehearing (filed July 19, 2012) Montana-Dakota states, "If it had been provided proper notice, Montana-Dakota would have shown that while 6 MW of CREP generating capacity will allow it to meet its obligations under the Act through 2014, it will likely need another 4 MW of CREP power in 2015 to meet its obligations under the Act."

- a. Please provide a complete list of assumptions and the detailed calculation showing how Montana-Dakota computed its obligations under the Act through 2014.
- b. Please provide a complete list of assumptions and the detailed calculation as to how Montana-Dakota's obligations under the Act in 2015 (given as an additional 4 MW) were computed.

PSC-015

Regarding: Cost of Additional CREP Power

Witness: Neigum

On page 10 of the Consolidated Motions for Reconsideration and Rehearing, Montana-Dakota states, "It would have further shown that the likely annual cost of acquiring that additional 4 MW of CREP power would approach a half million dollars." On page 9 of your testimony, you estimate the incremental cost of acquiring 4 MW of Montana CREPs to be \$485,654. On page 4, you estimate that Montana-Dakota's CREP requirement in 2015 will be 8 MW. On page 9, you indicate Montana's share of Cedar Hills is 5.3 MW. This results in an apparent shortfall of 2.7 MW, not 4 MW.

- a. Please explain how you arrive at a projected 4 MW shortfall in the CREP obligation if Diamond Willow was not to be recognized as two distinct CREPs.
- b. If the 4 MW calculation was an error, please show how this affects the cost calculation on page 9.
- c. Whatever the correct power shortfall is, please provide more complete documentation as to how the cost in dollars was determined, including the source and derivation of each key input.
- d. Please provide a list of alternatives to obtaining an additional 2.7 or 4 MW of power that is CREP qualified. Include the costs for each alternative and discuss the positive and negative aspects for each alternative.

PSC-016

Regarding: MISO Commercial Pricing Node

Witness: Addison and Neigum

Page 4 of Ms. Addison's testimony indicates that "the MISO data stream from the commercial pricing node is the same regardless of whether there are one or two wind farms behind the commercial pricing node," and page 7 of Mr. Neigum's testimony refers to a "single market generation value."

- a. Please explain whether MISO automatically assigns the same "market generation value" to multiple wind farms because they lie behind the same commercial pricing node.
- b. Please indicate whether MISO has ever assigned different "market generation values" to Diamond Willow I and II, and if not, further explain why not.
- c. Please explain how MRETS assigns a unique identifier ("REPORTINGENTITYID") to multiple units that lie behind a single MISO

commercial pricing node. Specifically, is a “REPORTINGENTITYID” unit-specific or entity-specific?

PSC-017

Regarding: MISO Interconnection Rights
Witness: Addison and Neigum

If Montana-Dakota had secured separate interconnection rights for Diamond Willow I and II, please indicate whether each would have had:

- a. Separate market generation values (please explain whether and how these “values” differ from the “generation data” referred to on page 8 of Mr. Neigum’s testimony); and
- b. Separate MISO commercial pricing nodes.

PSC-018

Regarding: Diamond Willow’s RFP Proposal
Witness: Neigum

On the bottom of page 5 and the top of page 6, you indicate that Montana-Dakota issued a Request for Proposal in September 2006 for renewable energy resources and the Diamond Willow project was both the least cost and best alternative presented.

Please provide the subject proposal and the final agreement relative to acquiring the Diamond Willow site from the developer as a result of Montana-Dakota’s 2006 RFP.

PSC-019

Regarding: 2008 RFP Respondents
Witness: Neigum

Regarding statements made on page 6, please explain why Diamond Willow 2 and Cedar Hills were not respondents to the 2008 RFP.

PSC-020

Regarding: Diamond Willow Construction and Generation Times
Witness: Neigum

On page 4, you state that Diamond Willow 1 was constructed “in 2007 and in full operation by February 2008.”

- a. Specifically, on what date did construction of Diamond Willow 1 begin?
- b. Did all Diamond Willow 1 turbines begin generating electrical power on the same date? If not, please give the date each turbine began generation.

PSC-021

Regarding: SGIA versus LGIA

Witness: Neigum

On pages 6 and 7, you describe how the MISO interconnection approval was obtained.

- a. Would a 19.5 MW wind farm have required an LGIA or an SGIA?
- b. If SGIA would have been sufficient, would it have been easier to obtain that interconnection than the process you describe on page 6 as "...no easy matter..."?
- c. If interconnected through two different agreements, would the Diamond Willow projects be behind two different MISO commercial pricing nodes?

PSC-022

Regarding: Cost Competitiveness and Cost Cap

Witness: Neigum

On page 9, you state that the 2010 CREP RFP responses "were not considered cost competitive".

Is your contention that Montana-Dakota would nonetheless be required to acquire such a CREP, or would it be eligible for an exemption under the Montana RPS's cost cap provision?

PSC-023

Regarding: Wind Plant Cost Allocation

Witness: Neigum

On pages 8 and 9, you state, "The costs for Cedar Hills are jurisdictionally allocated among Montana-Dakota's customers in Montana, North Dakota, and South Dakota."

- a. Please provide the portion from the ruling of the Montana PSC in Montana-Dakota's last rate case where the Commission ordered costs from wind plants in Montana-Dakota's service territory to be allocated on this jurisdictional basis.
- b. If no such ruling of the Montana Commission exists, please state the same.

PSC-024

Regarding: MISO Commercial Pricing Node
Witness: Addison

On page 3 you explain how Diamond Willow 1 and 2 are behind a MISO commercial pricing node (CPNode).

- a. Please provide further explanation as to how a MISO commercial pricing node is constituted.
- b. Provide a map of MISO commercial pricing nodes in Montana-Dakota's service territory within MISO. Identify by name and generator each commercial pricing node in Montana-Dakota's service territory within MISO.
- c. Please provide examples from Montana-Dakota's service territory within MISO, if any, of commercial pricing nodes where two putatively distinct generating facilities are located behind the same commercial pricing node.